

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Nautilus Insurance Company,

Plaintiff,

Versus

Richard Alexander Murdaugh, Sr., Cory

Fleming, Moss & Kuhn, P.A., Chad

Westendorf, and Palmetto State Bank,

Defendants.

C/A No. 2:22-cv-1307-RMG

**MOSS & KUHN, P.A.'S
OBJECTIONS TO PLAINTIFF'S
SUPPLEMENTAL EXHIBIT LIST**

The Defendant Moss & Kuhn, P.A. (hereinafter “this Respondent”), by its undersigned attorneys, hereby submits the following list of objections to Nautilus Insurance Company’s exhibits it intends to or may present at trial:

No.	Description	Bates/Docket No. (if applicable)	Objections
1	March 8, 2018 Letter from Cory Fleming regarding institution of wrongful death claim against Defendant Murdaugh	ECF No. 187-3	
2	April 22, 2019 Letter from John Grantland to Cory Fleming enclosing check for \$3.8m from Nautilus and establishing conditions for depositing and releasing those funds from trust.	ECF No. 187-23	
3	April 18, 2019 Nautilus check for \$3.8m	ECF No. 187-31	
4	December 20, 2017 email to Cory Fleming from Forge Consultants	Ex. 7 to Fleming deposition	
5	May 25, 2023 Transcript of Cory Fleming Federal Guilty Plea	ECF No. 187-1	FRE 401, 403, 801

6	December 13, 2018 Application and December 18, 2018 order Appointing successor PR	ECF No. 187-10	
7	December 18, 2018 Fiduciary letter issued by Probate Court to Successor PR	ECF No. 187-14	
8	December 19, 2018 Petition for Approval of Wrongful Death Settlement (Lloyd's)	ECF No. 187-15	FRE 401, 403, 801
9	November 28, 2018 Fleming emails regarding appointment of Chad Westendorf as successor PR	ECF No. 187-7	
10	January 7, 2018 Disbursement Statement - Lloyd's – 475k	ECF No. 187-19	FRE 401, 403, 801
11	May 13, 2019 Disbursement Statement – Lloyd's 505k, Nautilus 3.8	ECF No. 187-27	
12	September 30, 2021 Account ledger showing disbursements from M&K Trust Account	ECF No. 187-21	
13	May 13, 2019 Signed, unfiled order approving settlement	ECF No. 187-24	
14	September 30, 2020 Emails re clerk of court's Notice of Hearing re ADR Compliance for case 2018-CP-25-00505	ECF No. 187-29	
15	October 6, 2020 Filed Stipulation of Dismissal for case 2018-CP-25-00505	ECF No. 187-30	
16	March 25, 2019 Mediation agreement in re: claims of the estate of Gloria Satterfield	ECF No. 187-32	
17	May 27, 2022 Confession of Judgment and Stipulation by RA	ECF No. 187-34	FRE 401, 403, 801

	Murdaugh in Satterfield suit, 2021-CP-25-00298		
18	Fleming State Indictment	ECF No. 240-1	FRE 401, 403, 801
19	Fleming State Guilty Plea	ECF No. 240-2	FRE 401, 403, 801
20	March 28, 2018 - Probate court appointment of Michael Satterfield as PR for Estate of Gloria Satterfield	ECF No. 187-4	
21	March 8, 2018 letter from Alex Murdaugh assistant to medical group re Gloria Satterfield medical records	ECF No. 187-5	
22	Handwritten notes by C. Fleming on March 1, 2018 email re wrongful death Claim	CHF_00005	
23	April 2, 2018 email from Murdaugh assistant to Fleming assistant re PR Appointment	CHF_00262-64	
24	July 20, 2018 email from Fleming assistant to Murdaugh assistant attaching Satterfield Authorizations	CHF_00254-56	
25	November 30, 2018 email from Fleming assistant to Lloyds'-appointed defense counsel requesting check made out to C. Westendorf	CHF_00001	FRE 401, 403, 801
26	January 14-15 email exchange between Fleming and Westendorf re filing of document pertaining to Lloyd's settlement	CHF_00288-89	FRE 401, 403, 801
27	February 14, 2019 emails between Fleming and Fleming assistant regarding collecting Satterfield medical records from Hampton	CHF_00207-09	FRE 401, 403, 801

28	March 27, 2019 email from A. Miller to J. Lasky regarding mediation	NAUTILUS_006377	
29	February 22-25, 2019 email exchange between J. Grantland, A. Miller regarding mediation	PHELPS-000366-67	
30	March 22-24, 2019 email exchange between A. Miller, K. Karam regarding mediation	PHELPS-000932	
31	March 29, 2019 email from Fleming to Grantland regarding structured settlement	CHF_00327	
32	March 30, 2019 email from Fleming to Grantland regarding structured settlement	CHF_00332-33	
33	April 10, 2019 emails between Fleming and assistant regarding release	CHF_00162-63	
34	April 25, 2019 email from Fleming requesting Judge Mullen hear petition to approve settlement	CHF_000003	
35	May 6, 2019 emails between Fleming and Grantland regarding approval proceeding	CHF_000346, 00348	
36	October 5, 2020 stipulation of dismissal of case number 2018-CP-25-00505 in Hampton County, South Carolina	n/a	
37	October 6, 2020 emails between Fleming and assistant regarding disbursement of addition funds to Forge	CHF_00157-58	
38	November 13, 2018 email regarding change of Personal Representative	CHF_00088-0090	FRE 401, 403, 801

39	Nautilus Claims Notes	NAUTILUS_002381-564	
40	MKF cancelled check	PSB 000355 (Ex. 3 to M&K 30(b)(6) deposition)	
41	MKF cancelled check	MOSS & KUHN 0068 (Ex. 4 to M&K 30(b)(6) deposition)	
42	MKF cancelled check	BBT (9-27-2021)-001311 (Ex. 5 to M&K 30(b)(6) deposition)	
43	November 6, 2018 letter from S. Wallinger to Brit, CJW with comprehensive report on claim by Murdaugh re Satterfield	M&G000092-118	
44	November 12, 2018 letter from D. Rheney to A. Miller re Lloyds' tendering limits	M&G000121-23	
45	November 8, 2018 emails between Fleming to Jennifer Johnson re extension to response to demand letter	CHF_00277	
46	February 21, 2019 emails between Fleming and Grantland re mediation	CHF_00304	
47	March 29, 2019 emails between Fleming to Grantland re Conservatorship	CHF_00327-00328	
48	March 30, 2019 email from Fleming and Grantland re check payee	CHF_00332-00333	

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Charleston, South Carolina

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